Filed: 8/14/2020 2:54 PM
Lynne Finley
District Clerk
Collin County, Texas
By Tatiana Ortega Deputy
Envelope ID: 45401942

NO. 417-53803-2020

IN THE INTEREST OF	**§**	**IN THE DISTRICT COURT**
	§	
S.A.L, J.L.L., AND L.A.L.,	**§**	**417TH JUDICIAL DISTRICT COURT**
	§	
CHILDREN	**§**	**COLLIN COUNTY, TEXAS**

PETITIONER'S MOTION FOR ADDITIONAL TEMPORARY RESTRAINING ORDER

Michael Long, Petitioner, submits this Motion for Additional Temporary Restraining Order and would respectfully show as follows:

Michael Long requests that the Court grant an additional Temporary Restraining Order to protect the safety and wellbeing of the child. Failure to grant such Temporary Restraining Order would endanger the child's safety and wellbeing, and Petitioner has no other adequate remedy at law.

As the basis for the extraordinary relief requested below, Petitioner would show that before the filing of this petition **and after the hearing held on August 12, 2020,** the events contained in the attached *Exhibit A* have occurred. Based on that affidavit, Petitioner requests the Court to grant the following relief:

Issue an order excluding Respondent from possession of or access to the children.

Prayer

Petitioner prays that the Court immediately grant a temporary restraining order restraining Respondent, in conformity with the allegations of this petition, from the acts set forth above, and Petitioner prays that, after notice and hearing, this temporary restraining order be made a temporary injunction.

Petitioner prays for general relief.

Respectfully submitted,

MOHR LAW GROUP
5830 Granite Parkway
Suite 100-220
Plano, Texas 75024
Tel: 972.265.9530

By: Taylor Mohr
Taylor M. Mohr
State Bar No. 24081049
taylor@mohrlawgroup.com
Attorney for Michael Long

CERTIFICATE OF CONFERENCE

I certify that Amber Shemesh, Counsel for Respondent, was notified at least 2 hours in advance of this Motion being submitted to the Court.

Taylor Mohr
Taylor M. Mohr
Attorney for Michael Long

CERTIFICATE OF SERVICE

I certify that a true copy of this document was served in accordance with rule 21a of the Texas Rules of Civil Procedure on the following on August 14, 2020:

Amber Shemesh by electronic filing manager at amber@shameshfamilylaw.com.

Taylor Mohr
Taylor M. Mohr
Attorney for Michael Long

EXHIBIT A

PETITIONER'S SUPPORTING AFFIDAVIT

Michael Long appeared in person before me today and stated under oath:

"My name is Michael Long. I am above the age of eighteen years, and I am fully competent to make this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

"I am the Petitioner in this case and the children's father.

"On August 13, 2020 (**after the hearing held on August 12, 2020**), Sophie's doctor called us highly concerned about results she had received from Sophie's medical tests. She instructed us to bring Sophie in immediately. Sophie made additional statements to the doctor that were inappropriate and highly concerning (for example, Sophie asked the doctor if the doctor would need to take pictures of her vagina).

"Sophie's doctor is now having Sophie tested for STDs like chlamydia. She has also ordered a pelvic ultrasound and an abdominal ultrasound. Sophie is also experiencing chronic vaginal pain and rectal disfunction and making outcries claiming to be concerned that she will be killed if she returns to her mom's house now that she has told people what has been happening to her. Sophie's treating physician has stated that Sophie should not travel for more than 15 minutes right now and that she should immediately report for these additional tests. Sophie's doctor has also said that if these conditions are not immediately treated, they could become life threatening. The information from Sophie's doctor is attached to this affidavit and incorporated into this affidavit by reference.

"Given the seriousness of Sophie's allegations, the medical tests she needs to

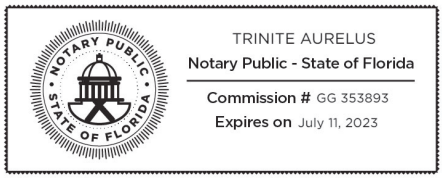
report for, and her doctor's instructions not to travel, I am asking the court to deny Respondent access to or possession of Sophie until we have a hearing on these issues.

"Based on the seriousness of Sophie's statements and her medical needs, I believe that failure to grant this additional TRO will endanger Sophie's health. According to the doctor, travel and failure to seek immediate medical treatment could be life threatening.

Michael Long

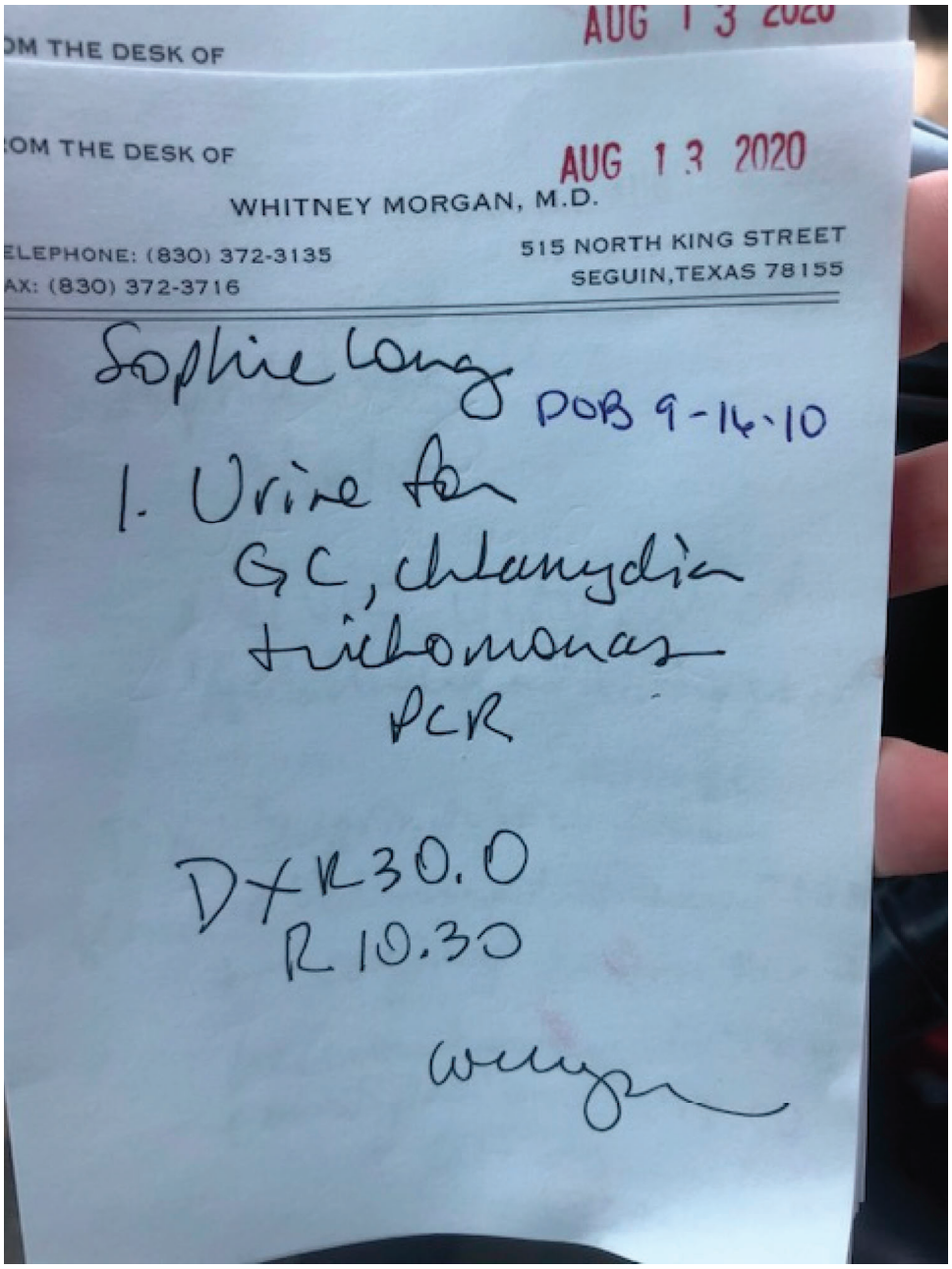
SIGNED under oath before me on 08/14/2020.

GG 353893
07/11/2023
Florida
Broward



Notary Public, State of Florida

Electronic Notary Public
Notarized online using audio-video communication



OM THE DESK OF AUG 13 2020

OM THE DESK OF AUG 13 2020

WHITNEY MORGAN, M.D.

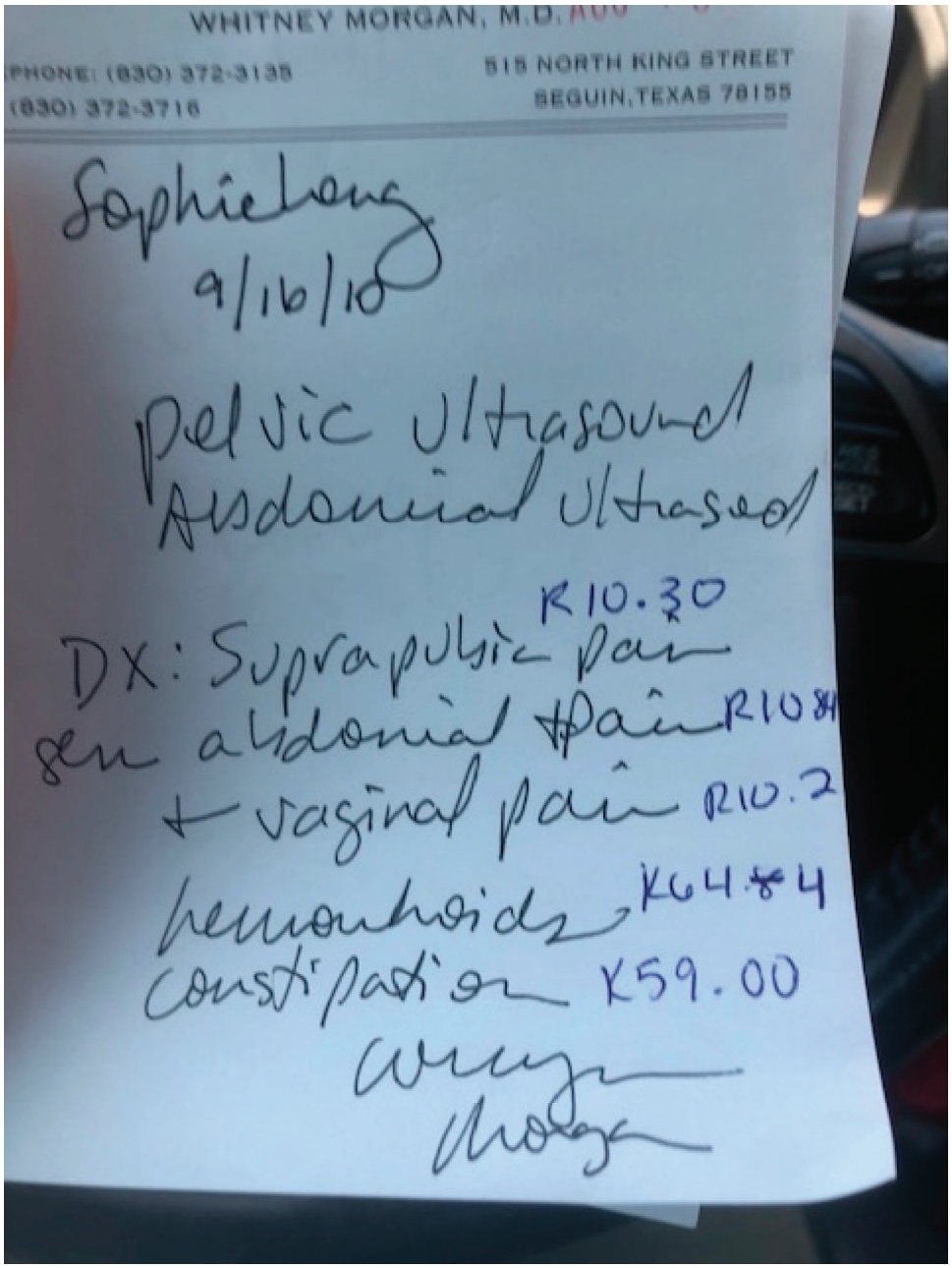
ELEPHONE: (830) 372-3135
AX: (830) 372-3716

515 NORTH KING STREET
SEGUIN, TEXAS 78155

Sophie Long DOB 9-14-10

1. Urine for
GC, chlamydia
trichomonas
PCR

Dx R30.0
R10.30



WHITNEY MORGAN, M.D.

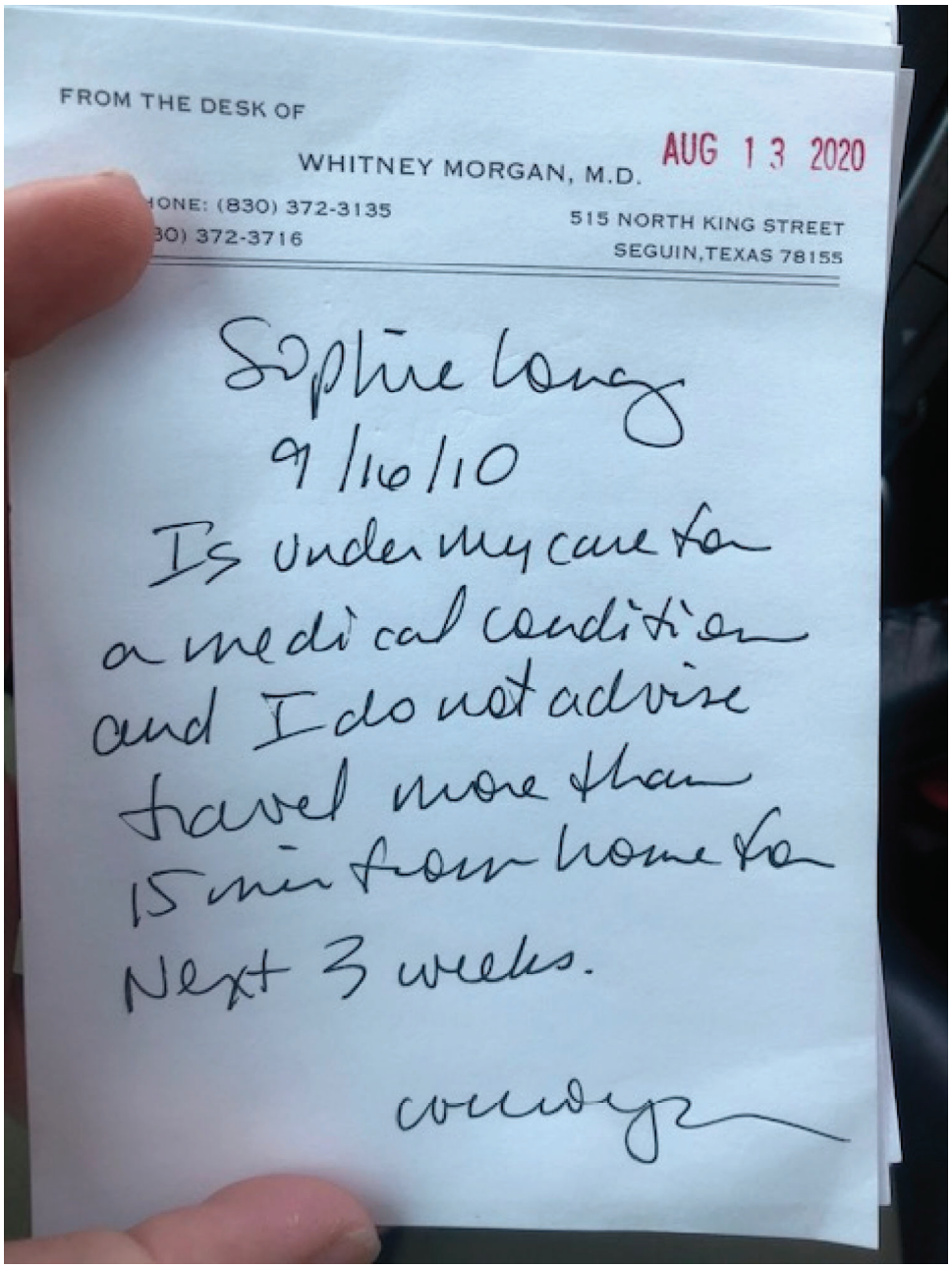
PHONE: (830) 372-3135
(830) 372-3716

515 NORTH KING STREET
SEGUIN, TEXAS 78155

Sophie Long
9/16/10

Pelvic Ultrasound
Abdominal Ultrasound

DX: Suprapubic pain R10.30
generalized abdominal pain R10.84
+ vaginal pain R10.2
hemorrhoids K64.4
constipation K59.00



FROM THE DESK OF

WHITNEY MORGAN, M.D.

AUG 13 2020

HONE: (830) 372-3135
30) 372-3716

515 NORTH KING STREET
SEGUIN, TEXAS 78155

Sophie Long
9/16/10
Is under my care for a medical condition and I do not advise travel more than 15 min from home for Next 3 weeks.

Whitney

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Taylor Mohr on behalf of Taylor Mohr
Bar No. 24081049
taylor@mohrlawfirm.com
Envelope ID: 45401942
Status as of 8/17/2020 1:33 PM CST

Associated Case Party: Michael Long

Name	BarNumber	Email	TimestampSubmitted	Status
Meredith Mallonee Chacon	24034980	info@ccatxlaw.com	8/14/2020 2:54:27 PM	SENT

Associated Case Party: Kelly Long

Name	BarNumber	Email	TimestampSubmitted	Status
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Adriana Cancino		acancino@shemeshfamilylaw.com	8/14/2020 2:54:27 PM	SENT
Alexandra Willen		awillen@shemeshfamilylaw.com	8/14/2020 2:54:27 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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Mary Spring		maryspring@mohrlawfirm.com	8/14/2020 2:54:27 PM	SENT